5ME-14

09 DEC 1986

Mr. Ronald J. Hewitt
Planning Department
City of Detroit
3400 Cadillac Tower
Detroit, Michigan 48226

Attention: Thomas P. Andrews

Dear Mr. Hewitt:

In accordance with the National Environmental Policy Act and Section 309 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (EIS) for the Jefferson/Conner Industrial Revitalization Project. The project is located in Detroit, Michigan. The City of Detroit has requested funding from the U.S. Department of Housing and Urban Development and the U.S. Department of Commerce.

Our review of this project has resulted in concerns related to the proposed waste cleanup, noise impacts, and air quality impacts. We have given this project an "EO-2" rating. This rating indicates "environmental objections". The "2" notes that we have requested more information. This rating will be published in the Federal Register. We will object to the release of Federal funds for this project until satisfactory remedial investigation and remedial action plans have been developed and our noise and air quality concerns have been addressed.

Thank you for the opportunity to review the Draft EIS for the Jefferson/Conner Industrial Revitalization Project,. If you have questions related to these comments, please contact Tom Nowicki, at 312-886-4244.

Sincerely yours,

William D. Franz, Chief
Environmental Review Branch
Planning and Management Division

Enclosures

cc: W. Furton, HUD
B. Eleder, 5HE

5ME-14:TNowicki:11/28/86:12/8/86

Comments from the U.S. Environmental Protection Agency, Region V Regarding the Draft Environmental Impact Statement for the proposed Jefferson/Conner Industrial Revitalization Project

Project Description

The proposed Jefferson/Conner Industrial Revitalization Project consists of acquisition, relocation, demolition, and site preparation of approximately 850 acres located in eastern Detroit. The site of the project has Conner Avenue on the Northeast, Mack Avenue on the northwest, Freud Avenue on the southeast, and St. Jean Avenue on the southwest. The project would close Kercheval, Vernor, and Charlevoix Avenues, between Conner and St. Jean. Mack Drive would be elevated over railroad tracks. The project would require the acquisition of approximately 1,000 parcels of land, relocation of 1,500 persons and 120 businesses and institutions, and demolition of approximately 734 structures.

A 325 acre site would be used for a new two million square foot, single story Chrysler assembly plant. The existing Jefferson Avenue Assembly Plant would be demolished. As the first phase of this project, Chrysler plans to install a "phosphate/uniprime pretreatment system" in 1987.

Waste Identification and Disposal

Identification and disposal of toxic and hazardous materials is our primary concern related to the Jefferson/Conner Industrial Revitalization Project. Soil and groundwater contamination is a concern because of the industrial history of the project's location. Identification and disposal of materials such as asbestos and polychlorinated biphenyls (PCBs) is especially important because of the great amount of demolition that would occur.

The Draft EIS noted that the Jefferson Avenue Assembly Plant contains four PCB transformers, fifteen PCB capacitors, and 103,500 cubic feet of asbestos. Information regarding regulated materials in other buildings to be demolished was not included in the Draft EIS.

The Draft EIS discussed waste identification and disposal on pages IV-27 to IV-30, V-17 to V-30, and appendices F, H, I, and J. We have identified five primary issues in the Jefferson/Conner waste cleanup:

1. Resource Conservation and Recovery Act (RCRA) closure of the existing Chrysler facility

2. Identification of hazardous and toxic materials

3. Development of Remedial Actions

4. Implementation of Remedial Actions

5. Compliance with RCRA and Toxic Substances Control Act and the appropriate State and local regulations.

Regarding the first issue, the Final EIS should indicate whether the Jefferson Avenue Assembly plant will require a RCRA closure permit. The Final EIS should discuss the amount of waste storage at the plant and if the facility is classified under RCRA as a storage facility or only a "generator". Closure requirements for storage areas should also be discussed. Items 2, 3, and 4 are addressed in the waste identification and disposal plans discussed below.

The sections in the Draft EIS pertaining to waste identification and disposal provided a good framework for the development of waste management plans. A reorganization of the described tasks, however, will result in a more effective waste identification and disposal process. The procedure discussed in the Draft EIS was a piecemeal approach. We suggest that the cleanup be reorganized into one unified effort by integrating elements of Phase I, Phase II, and the Hazardous Waste Management Plan (HWMP):

1. The investigations described in Phases I and II should include the investigatory elements of the HWMP. These elements of the HWMP are 1, 2, 3, 6, 8, 13, 14, 15.

2. The remedial action-mitigation portion should incorporate elements 4, 5, 7, 9, 14, 15, of the HWMP.

3. Storm sewer sampling should be included in the investigation portion of the waste cleanup.

4. Two phases for the investigation are recommended because the first phase allows the second phase to concentrate on specific needs identified in the first phase.

5. The actual demolition of buildings, excavation, removal, and disposal of debris, which may require additional sampling, analysis, and removal of contaminated materials, would constitute the final phase of the cleanup. Elements 10, 11, and 12 of the HWMP would fit here.

An outline of a solid and hazardous waste management plan is enclosed.

The Final EIS should address subjects such as quality assurance/quality control, health and safety, and emergency action planning. Because it is probable that this project will result in the generation of RCRA hazardous waste, a discussion covering the requirements for notification, waste handling and storage, and waste transport and disposal should be addressed in the Final EIS.

We have several recommendations and requests for clarification regarding the proposed investigations. The Draft EIS failed to clearly indicate the number of groundwater samples that will be collected. Every groundwater monitoring well should be sampled at least once. The Draft EIS did not justify the choice of parameters and detection limits for the sampling program. Particularly questionable is the use of the EP toxicity test for the groundwater samples.

We recommend that the hazardous substances list (HSL) from EPA's Contract Lab Program (CLP) be used for all soil and groundwater samples. Analytical procedures should also be consistent with EPA's CLP. A HSL is enclosed. Guidance regarding the CLP will be shipped separately. For waste samples, the requirements of RCRA would have to be followed, specifically 40 CFR Part 261, the definition of hazardous waste. Finally, in order to maintain consistency and uniformity in the soil and groundwater samples, all borings should be made using the same procedure.

The Final EIS should indicate how storm sewer samples will be collected. The storm sewer sampling in the second phase of the investigation can be based upon the results of the first phase.

The Draft EIS discussed soil contamination, but did not discuss the possibility of finding buried wastes. This should be addressed in the Final EIS. While the Draft EIS discussed identification of underground storage tanks, above ground storage tanks should not be disregarded.

Appendix H, titled Solid and Hazardous Waste Recommendations, was empty. A notice indicated that this section was being revised. In the future, please do not file EISs until they are complete.

Noise

The Draft EIS noted that the predominant sources of noise would be railroad and automobile traffic. Railroad noise is a major issue because the proposed project includes a new switching yard along the east side of St. Jean Avenue. Twelve trains a day would use the new yard. The unmitigated noise impact from the new railroad yard on residences west of St. Jean Avenue was predicted to be 75 dBA Ldn, which is 10 dBA Ldn above the Department of Housing and Urban Development's (HUD) noise criteria.

The Draft EIS discussed a twenty foot high berm on the east side of St. Jean Avenue. This noise barrier would reduce the sum of railroad noise and traffic noise at residences west of St. Jean to 64 dBA Ldn.

The Draft EIS also noted that existing noise levels along Conner Avenue are above HUD criteria. These high noise levels result from traffic on Conner Avenue. The Draft EIS discussed a twelve foot barrier along the east side of Conner to reduce this noise.

In order to minimize the noise impacts of the proposed project, the proposed noise barriers along St. Jean and Conner Avenues should be implemented. The Final EIS should contain a commitment to this noise mitigation. The Final EIS should also discuss whether welded rail or a concrete bed will be used to reduce rail noise.

Air Quality

In general, EISs for projects that result in air quality impacts should discuss the State Implementation Plan (SIP) for the National Ambient Air Quality Standards. The EIS must confirm that the proposed action is consistent with the SIP.

The Draft EIS presented results of carbon monoxide mobile source modeling for the Conner/Jefferson intersection. The Draft EIS indicated that this intersection would have the highest traffic volume, and therefore would provide worst case scenario. The modeling used a background concentration of 3 ppm during the peak hour and 1 ppm off-peak. The Draft EIS discussed the results of the modeling on page V-6:

> "Preliminary calculations indicate a maximum one hour concentration of 18 parts per million...and a maximum eight hour concentration of 6 ppm...at the edge of the mixing cell...."

The preceding quotation indicated that results were "preliminary". The Final EIS should contain final values. The Final EIS must rationalize the background concentrations and demonstrate that they are acceptable to State and local air management agencies. The Final EIS should discuss whether the traffic levels modeled in the air quality studies represent the volume of traffic associated with a fully developed project, or only the traffic resulting from the new Chrysler facility. The Final EIS should discuss the dimensions of the mixing cell and the actual location of modeled values.

The Final EIS should discuss the model that was used. We support the use of Mobile 3 for emission factors and Caline 3 for dispersion modeling. If other models are used, they must be justified.

A technical appendix should provide the details of the air quality modeling. Appendix M, of the Draft EIS, was titled Air Quality Analysis. Appendix M was actually a report prepared by the Michigan Department of Natural Resources titled Michigan 1985 Air Quality Report. This document contained a summary of generic air quality information for all of Michigan. These data are not relevant to the specific needs of the Jefferson/Conner Industrial Revitalization EIS.

The Draft EIS said the new "Pretreatment/Uniprime" system will result in a net reduction in emissions of volatile organic compounds (VOC) when compared to the existing dip and spray system. The Draft EIS also compared existing emissions from the other elements of existing Jefferson Avenue Assembly Plant with the proposed facility. A troublesome aspect of this comparison was that units were not included. The Draft EIS said emissions of volatile organic compounds would increase from 3461 to 5100. Particulates from "Process 1" would increase from 57.1 to 75.6. The Final EIS should discuss the significance of these increases and consistency with air quality permits.

The Draft EIS did not discuss impacts of industrial sources other than Chrysler. We understand that the type and number of industries that will move into the area surrounding the Chrysler plant is not known. A requirement for all new tenants should be early coordination, with the Wayne County Air Pollution Control Division and the Michigan Department of Natural Resources, regarding potential air quality impacts.

I. Project Area Investigation
   A. Initial Site Survey
      1. Includes elements of site inspections outlined in DEIS, pages V 19-21.
      2. Inspection of buildings to identify potential/actual sources of hazardous/toxic materials/wastes.
      3. A survey of above and below ground tanks, drums, and other containers.
      4. Identify areas of spills, leaks, previous disposal of waste.
      5. Inspection of residential areas.
      6. Identification of PCB and asbestos wastes and holding areas.
      7. Documerts searches of properties and State/Federal files, as desribed on page V 20, and to identify any old dump sites.

   B. Geophysical Methods Investigation
      1. Magnetic/magnetometer survey
      2. Soil borings/soil sampling
      3. Monitor well construction and development

   C. Hydrogeologic Investigation
      1. Groundwater sampling

   D. Characterization of Wastes
      1. RCRA hazardous
      2. PCB
      3. Asbestos
      4. Non-hazardous

      [This would require sampling, analysis, estimation of volumes.]

   E. Storm Sewer Sampling

   F. Evaluation of Data

II. Remedial Actions Addressing Results of Investigation
   A. Development of, regarding
      1. Waste disposal
      2. Clean-up of contaminated areas

   B. Evaluation and selection of actions

   C. Implementation of actions

III. Demolition of Buildings/Excavation
   A. Demolition

   B. Disposal of debris

   C. Additional sampling, as needed

   D. Additional remedial action, as needed

   E. Excavation

   F. Disposal of any excavated waste

EXHIBIT C

Hazardous Substance List (HSL) and Contract Required Detection Limits (CRDL)**

Volatiles	CAS Number	Detection Limits* Low Water[a] ug/L	Low Soil/Sediment[b] ug/Kg
1. Chloromethane	74-87-3	10	10
2. Bromomethane	74-83-9	10	10
3. Vinyl Chloride	75-01-4	10	10
4. Chloroethane	75-00-3	10	10
5. Methylene Chloride	75-09-2	5	5
6. Acetone	67-64-1	10	10
7. Carbon Disulfide	75-15-0	5	5
8. 1,1-Dichloroethene	75-35-4	5	5
9. 1,1-Dichloroethane	75-35-3	5	5
10. trans-1 2-Dichloroethene	156-60-5	5	5
11. Chloroform	67-66-3	5	5
12. 1,2-Dichloroethane	107-06-2	5	5
13. 2-Butanone	78-93-3	10	10
14. 1,1,1-Trichloroethane	71-55-6	5	5
15. Carbon Tetrachloride	56-23-5	5	5
16. Vinyl Acetate	108-05-4	10	10
17. Bromodichloromethane	75-27-4	5	5
18. 1,1,2,2-Tetrachloroethane	79-34-5	5	5
19. 1,2-Dichloropropane	78-87-5	5	5
20. trans-1,3-Dichloropropene	10061-02-6	5	5
21. Trichloroethene	79-01-6	5	5
22. Dibromochloromethane	124-48-1	5	5
23. 1,1,2-Trichloroethane	79-00-5	5	5
24. Benzene	71-43-2	5	5
25. cis-1,3-Dichloropropene	10061-01-5	5	5

(continued)

Volatiles	CAS Number	Detection Limits* Low Water[a] ug/L	Low Soil/Sediment[b] ug/Kg
26. 2-Chloroethyl Vinyl Ether	110-75-8	10	10
27. Bromoform	75-25-2	5	5
28. 2-Hexanone	591-78-6	10	10
29. 4-Methyl-2-pentanone	108-10-1	10	10
30. Tetrachloroethene	127-18-4	5	5
31. Toluene	108-88-3	5	5
32. Chlorobenzene	108-90-7	5	5
33. Ethyl Benzene	100-41-4	5	5
34. Styrene	100-42-5	5	5
35. Total Xylenes		5	5

[a]Medium Water Contract Required Detection Limits (CRDL) for Volatile HSL Compounds are 100 times the individual Low Water CRDL.

[b]Medium Soil/Sediment Contract Required Detection Limits (CRDL) for Volatile HSL Compounds are 100 times the individual Low Soil/Sediment CRDL.

Semi-Volatiles	CAS Number	Detection Limits[a] Low Water[c] ug/L	Low Soil/Sediment[c] ug/Kg
36. Phenol	108-95-2	10	330
37. bis(2-Chloroethyl) ether	111-44-4	10	330
38. 2-Chlorophenol	95-57-8	10	330
39. 1,3-Dichlorobenzene	541-73-1	10	330
40. 1,4-Dichlorobenzene	106-46-7	10	330
41. Benzyl Alcohol	100-51-6	10	330
42. 1,2-Dichlorobenzene	95-50-1	10	330
43. 2-Methylphenol	95-48-7	10	330
44. bis(2-Chloroisopropyl) ether	39638-32-9	10	330
45. 4-Methylphenol	106-44-5	10	330
46. N-Nitroso-Dipropylamine	621-64-7	10	330
47. Hexachloroethane	67-72-1	10	330
48. Nitrobenzene	98-95-3	10	330
49. Isophorone	78-59-1	10	330
50. 2-Nitrophenol	88-75-5	10	330
51. 2,4-Dimethylphenol	105-67-9	10	330
52. Benzoic Acid	65-85-0	50	1600
53. bis(2-Chloroethoxy) methane	111-91-1	10	330
54 2,4-Dichlorophenol	120-83-2	10	330
55. 1,2,4-Trichlorobenzene	120-82-1	10	330
56. Naphthalene	91-20-3	10	330
57. 4-Chloroaniline	106-47-8	10	330
58 Hexachlorobutadiene	87-68-3	10	330
59 4-Chloro-3-methylphenol (para-chloro-meta-cresol)	59-50-7	10	330
60. 2-Methylnaphthalene	91-57-6	10	330
61. Hexachlorocyclopentadiene	77-47-4	10	330
62. 2,4,6-Trichlorophenol	88-06-2	10	330
63. 2,4,5-Trichlorophenol	95-95-4	50	1600

(continued)

Semi-Volatiles	CAS Number	Detection Limits* Low Water[c] ug/L	Low Soil/Sediment[c] ug/Kg
64. 2-Chloronaphthalene	91-58-7	10	330
65. 2-Nitroaniline	88-74-4	50	1600
66. Dimethyl Phthalate	131-11-3	10	330
67. Acenaphthylene	208-96-8	10	330
68. 3-Nitroaniline	99-09-2	50	1600
69. Acenaphthene	83-32-9	10	330
70. 2,4-Dinitrophenol	51-28-5	50	1600
71. 4-Nitrophenol	100-02-7	50	1600
72. Dibenzofuran	132-64-9	10	330
73. 2,4-Dinitrotoluene	121-14-2	10	330
74. 2,6-Dinitrotoluene	606-20-2	10	330
75. Diethylphthalate	84-66-2	10	330
76. 4-Chlorophenyl Phenyl ether	7005-72-3	10	330
77. Fluorene	86-73-7	10	330
78. 4-Nitroaniline	100-01-6	50	1600
79. 4,6-Dinitro-2-methylphenol	534-52-1	50	1600
80. N-nitrosodiphenylamine	86-30-6	10	330
81. 4-Bromophenyl Phenyl ether	101-55-3	10	330
82. Hexachlorobenzene	118-74-1	10	330
83. Pentachlorophenol	87-86-5	50	1600
84. Phenanthrene	85-01-8	10	330
85. Anthracene	120-12-7	10	330
86. Di-n-butylphthalate	84-74-2	10	330
87. Fluoranthene	206-44-0	10	330
88. Pyrene	129-00-0	10	330
89. Butyl Benzyl Phthalate	85-68-7	10	330
90. 3,3'-Dichlorobenzidine	91-94-1	20	660
91. Benzo(a)anthracene	56-55-3	10	330
92. bis(2-ethylhexyl)phthalate	117-81-7	10	330
93. Chrysene	218-01-9	10	330
94. Di-n-octyl Phthalate	117-84-0	10	330
95. Benzo(b)fluoranthene	205-99-2	10	330
96. Benzo(k)fluoranthene	207-08-9	10	330
97. Benzo(a)pyrene	50-32-8	10	330

(continued)

Semi-Volatiles	CAS Number	Detection Limits* Low Water[c] ug/L	Low Soil/Sediment[c] ug/Kg
98. Indeno(1,2,3-cd)pyrene	193-39-5	10	330
99. Dibenz(a,h)anthracene	53-70-3	10	330
100. Benzo(g,h,i)perylene	191-24-2	10	330

[c]Medium Water Contract Required Detection Limits (CRDL) for Semi-Volatile HSL Compounds are 100 times the individual Low Water CRDL.

[d]Medium Soil/Sediment Contract Required Detection Limits (CRDL) for Semi-Volatile HSL Compounds are 60 times the individual Low Soil/Sediment CRDL.

Pesticides	CAS Number	Detection Limits* Low Water[e] ug/L	Low Soil/Sediment[f] ug/Kg
101. alpha-BHC	319-84-6	0.05	8.0
102. beta-BHC	319-85-7	0.05	8.0
103. delta-BHC	319-86-8	0.05	8.0
104. gamma-BHC (Lindane)	58-89-9	0.05	8.0
105. Heptachlor	76-44-8	0.05	8.0
106. Aldrin	309-00-2	0.05	8.0
107. Heptachlor Epoxide	1024-57-3	0.05	8.0
108. Endosulfan I	959-98-8	0.05	8.0
109. Dieldrin	60-57-1	0.10	16.0
110. 4,4'-DDE	72-55-9	0.10	16.0
111. Endrin	72-20-8	0.10	16.0
112. Endosulfan II	33213-65-9	0.10	16.0
113. 4,4'-DDD	72-54-8	0.10	16.0
114. Endosulfan Sulfate	1031-07-8	0.10	16.0
115. 4,4'-DDT	50-29-3	0.10	16.0
116. Endrin Ketone	53494-70-5	0.10	16.0
117. Methoxychlor	72-43-5	0.5	80.0
118. Chlordane	57-74-9	0.5	80.0
119. Toxaphene	8001-35-2	1.0	160.0
120. AROCLOR-1016	12674-11-2	0.5	80.0
121. AROCLOR-1221	11104-28-2	0.5	80.0
122. AROCLOR-1232	11141-16-5	0.5	80.0
123. AROCLOR-1242	53469-21-9	0.5	80.0
124. AROCLOR-1248	12672-29-6	0.5	80.0
125. AROCLOR-1254	11097-69-1	1.0	160.0
126. AROCLOR-1260	11096-82-5	1.0	160.0

[e]Medium Water Contract Required Detection Limits (CRDL) for Pesticide HSL Compounds are 100 times the individual Low Water CRDL.

[f]Medium Soil/Sediment Contract Required Detection Limits (CRDL) for Pesticide HSL compounds are 15 times the individual Low Soil/Sediment CRDL.

*Detection limits listed for soil/sediment are based on wet weight. The detection limits calculated by the laboratory for soil/sediment, calculated on dry weight basis, as required by the contract, will be higher.

** Specific detection limits are highly matrix dependent. The detection limits listed herein are provided for guidance and may not always be achievable.

Table 1. Elements Determined by Inductively Coupled Plasma Emission or Atomic Absorption Spectroscopy

Element	Contract Required Detection Level[1,2] (ug/L)
Aluminum	200
Antimony	60
Arsenic	10
Barium	200
Beryllium	5
Cadmium	5
Calcium	5000
Chromium	10
Cobalt	50
Copper	25
Iron	100
Lead	5
Magnesium	5000
Manganese	15
Mercury	0.2
Nickel	40
Potassium	5000
Selenium	5
Silver	10
Sodium	5000
Thallium	10
Vanadium	50
Zinc	20